

## EPTING & RANNIK

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June 28, 2023

### VIA ECF

The Honorable Richard M. Gergel  
U.S. District Judge  
District of South Carolina  
P. O. Box 835  
Charleston, SC 29402

RE: *Nautilus Insurance Company v. Richard Alexander Murdaugh, Sr., et al.*  
No. 2:22-cv-1307-RMG

Dear Judge Gergel:

I write on behalf of counsel for Palmetto State Bank (“PSB”) and Nautilus Insurance Company (“Nautilus”).

PSB and Nautilus have agreed that the 30(b)(6) deposition of PSB scheduled for Friday, June 30 will go forward, subject to the following. To the extent PSB believes a question implicates a topic or time-period that it has objected to in its Motion for a Protective Order, the witness may be instructed not to answer without the need for the filing for a separate protective order after the deposition. Then, should the Court deny PSB’s Motion for a Protective Order in any part, the parties would reconvene the deposition to address those topics.

We wanted the Court to be aware of this agreement so it knows that an immediate ruling on the Motion for a Protective Order is not necessary.

With thanks and kindest regards,

EPTING & RANNIK, LLC



Jaen G. Rannik  
JGR/agg

cc: All counsel of record (via ECF)